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Ref. No. 1872209.02/015435.00010

March 1, 2019

**(VIA US MAIL AND EMAIL)**

Michelle Mullin, Project Manager  
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Mail Code: OAW-150  
Seattle, WA 98101  
[Mullin.michelle@Epamail.epa.gov](mailto:Mullin.michelle@Epamail.epa.gov)

**Re: Rainier Commons – Substrate Report Compilation Requested – Phase I Close Out**

Dear Ms. Mullin,

We received your request for a substrate report compilation, transmitted via email on February 22, 2019, through EPA attorney Lynne Davies. Enclosed with this letter please find the reproductions and special compilation, as requested.

Your request is reproduced here for ease of reference:

- The status of pre-clearance and post-clearance substrate is unclear. The 12-18-2013 RBDA requires in Condition 8 in part that Rainier collect verification samples of concrete and any other substrate (clarified as any substrate other than brick in the Phase 1 IPWP approval 6-17-14) with a minimum of three samples per substrate. Data shall be sufficient for EPA to conclude that the visual performance standard is adequate to verify both removal of PCB bulk product waste and that no further cleanup is likely to be required for the remaining substrate.
  - o The data Rainier has submitted does not clearly demonstrate adherence to the conditions of the RBDA. Rainier shall submit to EPA a full and complete description of substrate sampling activities. All information shall be submitted in one package rather than spread throughout multiple workplans and letters. Rainier shall demonstrate to EPA that Condition 8 of the RBDA has been met through the description of activities including where, when and how the substrate was sampled; diagrams demonstrating where samples were collected; photo logs; summary tables including sample name, location, substrate type, and PCB

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results; and full lab packages with supporting data. This should be completed for all pre-abatement samples as well as post-abatement samples. This information is necessary for EPA to determine if any additional action, including sampling and/or additional abatement or controls are necessary to prevent risk of harm to health or the environment.

Your request references both “pre-abatement samples as well as post-abatement samples.” Pre-abatement substrate samples were not required or collected. The paint needed to be removed first, in order to get down to the substrate. We are providing the requested compilation for all required post-abatement, or verification substrate samples.

We collected pre-clearance samples, after the blasting work and before the hand grinding work was complete. These were collected for Rainier Commons internal reference and evaluation. It assisted our understanding of the effectiveness of the blasting work – highly effective – and gave a baseline to evaluate the benefit and utility of the additional hand work following blasting – low returns for the time, effort and cost. These samples were not required, but we reported the results to EPA in the July 10, 2015 Close-Out Report and accurately labeled them as Pre-Clearance samples.

The enclosures to this letter are itemized as follows:

1. Substrate Verification Compilation Summary with attachments;
2. Attachment 1 – EPA approved sampling plan, Exhibit 11 to the approve IPWP Phase I, reproduced;
3. Attachment 2 – Substrate Sampling Report, Exhibit 2 to Phase I Close Out Report, reproduced;
4. Attachment 2A - Subset of illustrative Phase I photographs;
5. Attachment 2B - Illustrative Schematics;
6. Attachment 2C – Balance of laboratory QA/QC 2014 pre-clearance (38 pages)
7. Attachment 3 – September 28, 2018 supplemental response to EPA, reproduced;
8. Attachment 4 – October 9, 2018 supplement to EPA, reproduced; and
9. Attachment 5 - Compilation Table Phase I substrate sampling results

We trust this compilation will be helpful to you in finalizing your approval of the Phase I Close-Out Report.

Very truly yours,

RYAN, SWANSON & CLEVELAND, PLLC



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JMF:raw

Attachments

cc: Lynne D. Davies (via email - [Davies.lynne@Epamail.epa.gov](mailto:Davies.lynne@Epamail.epa.gov))

Richard Allan (via email - [Allen.richard@Epa.gov](mailto:Allen.richard@Epa.gov))

Client